

From: [Johnson, Zebora](#)
To: [Bressant, Janet](#)
Cc: [Hebert, John](#)
Subject: FW: For communication purposes on Fabric Treated with Livinguard Technology
Date: Friday, March 12, 2021 10:18:21 AM
Attachments: [RE 75 Day Letter - PRIA 95700-E.msg](#)

From: Johnson, Zebora
Sent: Tuesday, December 08, 2020 2:44 PM
To: Kevin Kutcel <kevinkutcel@gmail.com>
Cc: Hebert, John <Hebert.John@epa.gov>
Subject: FW: For communication purposes on Fabric Treated with Livinguard Technology

Hi Kevin:

After careful review of your submission by the chemist, the following issues needs to be address by no later than the **COB on Tuesday December 15, 2020**. Should you have any additional questions or concerns feel free to contact, Dr. Ibrahim Laniyan.

Regards

Zebora

These are efficacy concerns:

1. The proposed label claims are not acceptable regarding the use of the product, Fabric Treated with Livinguard Technology (EPA File No. **95700-E**), as an effective continuous residual self-disinfectant, up to 48 hours, against *Staphylococcus aureus* (ATCC 6538) and *Pseudomonas aeruginosa* (ATCC 15442), on visibly clean hard, non-porous surfaces, at room temperature, for a 10-minute contact time.

- Provided CoAs did not show concentrations of tested fabric lots at the lower certified limit proposed on the CSF (Or minimally acceptable percentage of bound product).
- There was no evidence that the test was conducted on the worst case scenario when it comes to treating fabric with Lifeguard Technology (i.e., testing at or near the lowest possible percentage of active ingredients per total textile composition with the least and the most binding blend of textile)..
- Percentages of active ingredients per total textile composition were not determined.
- Textile types and/or blends of fabrics listed label are not acceptable because only one type of blend was tested.

2. If Residual Bacterial Self Disinfecting property of Fabric Treated with Livinguard Technology is accepted, it will be limited to 10 minutes after contaminations with continuous activity for up to 24 hours. 48-hours claims will not be acceptable.

3. Registrant must address the following when Residual Self-Disinfection Claims will be accepted:

- Add the Fabric Blend that efficacy was demonstrated on to the proposed label; and a disclaimer statement to the other fabric types and blends, unless the tested one is proven to be the worst-case scenario treatment and binding.
- Edit statement to read "Effective after 12 repeated inoculations of bacteria **within 24 hours**".
- Change all 48 hours continuous self-disinfection claims to 24 hours.
- Add washing instructions, number of industrial washes to the "Product Label"
- Add approved fabric blend (65%polyester and 35% cotton twill fabric) to the "Product Label".

Thank you

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